

Exhibit G

WASHINGTON:

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION

NWDC RESISTANCE AND COALITION OF
ANTI-RACIST WHITES,

PLAINTIFFS,

VS

CASE NO. 3:18-CV-05860-JLR

IMMIGRATION AND CUSTOMS ENFORCEMENT, TAE D.
JOHNSON, IN HIS OFFICIAL CAPACITY AS ACTING
DIRECTOR OF IMMIGRATION AND CUSTOMS ENFORCEMENT;
AND ALEJANDRO MAYORKAS, IN HIS OFFICIAL CAPACITY
AS SECRETARY OF HOMELAND SECURITY,

DEFENDANTS.

DEPOSITION BY ZOOM,
AND HOSTED BY COUNTY COURT REPORTERS, OF
LEAH MONTANGE

WEDNESDAY, AUGUST 23, 2023
10:03 A.M.

UNITED STATES ATTORNEY'S OFFICE
700 STEWART STREET
SUITE 5220
SEATTLE, WASHINGTON 98101

1 APPEARANCES

2 ON BEHALF OF THE PLAINTIFF,

3 NWDC RESISTANCE, AND APPEARING BY ZOOM:

4 CHRIS SWIFT, ESQUIRE

5 AMBIKA KUMAR, ESQUIRE

6 DAVIS WRIGHT TREMAINE, LLP

7 1300 SOUTHWEST FIFTH AVENUE

8 SUITE 2400

9 SEATTLE, WASHINGTON 97201

10 TELEPHONE: 503.276.5505

11 FACSIMILE: 503.432.7856

12 E-MAIL: CHRISSWIFT@DWT.COM

13 E-MAIL: AMBIKAKUMAR@DWT.COM

14

15 ON BEHALF OF THE DEFENDANT,

16 IMMIGRATION AND CUSTOMS ENFORCEMENT, ET AL,

17 AND APPEARING BY ZOOM:

18 YERIN CHO, ESQUIRE

19 MELISSA CLEMENTE, ESQUIRE

20 IMMIGRATION AND CUSTOMS ENFORCEMENT COUNSEL

21 500 TWELFTH STREET SOUTHWEST

22 SUITE 5600

23 WASHINGTON, DISTRICT OF COLUMBIA 20024

24 TELEPHONE: 703.603.3400

25

1 A. No, because he had been arrested on a
2 DUI years prior, right, no months prior, and he,
3 ICE wasn't taking any action, and they took
4 action 36 hours after he spoke about ICE.

5 Q. Okay, and are you aware of his current
6 status?

7 A. No. I'm not.

8 Q. Claudia Rueda, what is CARW's
9 understanding of her alleged...

10 A. I think this was the daughter, I think
11 this is the one where she was, her mom was
12 detained. Yeah. And then, so then she became an
13 activist around immigration enforcement in
14 defense of her family member who had been
15 detained, which takes a lot of bravery.

16 Q. And so...

17 A. I remember, I remember reading about
18 this case, this is another one that I remember
19 first learning about from a pleading in our
20 lawsuit in 2018 and then reading more about it.

21 Q. Okay.

22 A. Yeah. And just, it's just so sad.

23 Q. And so, what did...

24 A. He, they denied her bond, they didn't
25 give her bond.

1

Q. The Immigration Judge?

2

A. Yeah.

3

MR. SWIFT: Ms. Montange, please
refrain from interrupting when counsel is
speaking so that we can have a clear record here.

6

DEPONENT: Appreciate it. Sorry.

7

Q. Yeah, to make, to clarify things, what
exactly, so CARW is saying that she engaged in
speech how exactly?

10

A. She engaged in protests.

11

Q. Okay, against ICE?

12

A. For her mother's release.

13

Q. Okay. Okay.

14

A. In defense of her mother.

15

Q. And then as a result, how was she
allegedly targeted?

17

A. Shortly after her mother's release, she
was arrested.

19

Q. Okay.

20

A. Shortly meaning less than a week.

21

Q. And when was she protesting for her
mother's release?

23

A. When? You said when?

24

Q. Yes.

25

A. Yeah, this was in 2017.

1 Q. I'm looking for the time between the
2 protest and her arrest, do you know that?

3 A. Oh. I don't recall off the top of my
4 head.

5 Q. Did CARW consider any other potential
6 reasons that she may have been selected for
7 enforcement?

8 A. No.

9 Q. And do you know her current status?

10 A. I don't. I know that she was denied
11 for DACA, she was eligible, but she was denied.
12 And so that's something that is also very
13 disappointing and I would question, but I don't
14 know what her current status is.

15 Q. Okay and to be clear, you're not
16 claiming that ICE denied her DACA petition,
17 correct?

18 A. No. No.

19 Q. Okay David Martinez Garcia, what is
20 CARW's understanding of his alleged speech and
21 alleged targeting?

22 A. Yeah. I remember when this one
23 happened, and this was last year. And this was
24 someone who was protesting detention conditions
25 and he was threatened with solidarity, solitary

1 confinement unless he ended his hunger strike and
2 began to eat. And he said that he would eat in
3 that case, he preferred to end the strike and not
4 go to solitary confinement, and the, the CO's
5 refused to provide him with food after that.

6 Q. **Where was he detained?**

7 A. Sorry?

8 Q. **Where was he detained?**

9 A. This was at the Northwest Detention
10 Center in Tacoma, Washington.

11 Q. Okay so when you referred to CO's, you
12 were referring to people employed by the GEO
13 Group?

14 A. This is, yeah, yeah, as far as I know
15 it was GEO Group officials, but I could be
16 incorrect about that.

17 Q. Okay. Okay.

18 A. Yeah.

19 Q. **And do you know anything about Mr.
20 Martinez Garcia's current status?**

21 A. I don't.

22 Q. **Melesio Morales Mata.**

23 A. Mm-hmm (indicating affirmatively.) Yes.

24 Q. **What is CARW's understanding of his
25 alleged speech and targeting?**

1 **CERTIFICATE OF REPORTER AND SECURE ENCRYPTED**
2 **SIGNATURE AND DELIVERY OF CERTIFIED TRANSCRIPT**

3 I, **GLORIA MORALES**, Notary Public, do hereby
4 certify that the foregoing matter was reported by
5 stenographic and/or mechanical means, that same was
6 reduced to written form, that the transcript prepared
7 by me or under my direction, is a true and accurate
8 record of same to the best of my knowledge and ability;
9 that there is no relation nor employment by any attorney
10 or counsel employed by the parties hereto, nor financial
11 or otherwise interest in the action filed or its outcome.

12 This transcript and certificate have been digitally
13 signed and securely delivered through our encryption
14 server.

15 IN WITNESS HEREOF, I have here unto set my hand
16 this 31ST day of AUGUST, 2023.
17
18
19

20 

21 **GLORIA ISABEL MORALES**

22 Court Reporter / Notary

23 Notary Registration Number: 2430654

24 My Commission Expires: 12/13/2026

